

Nassau County

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Police Department

JAMES H. LAWRENCE
COMMISSIONER

June 27, 2007

Ms. Marlene H. Dortch
Secretary to the
Federal Communications Commission
Washington, D.C. 20554

Re: Petition for Reconsideration of the City of New York
WT Docket No. 99-87

Dear Ms. Dortch:

On behalf of the Nassau County Police Department (NCPD), this letter is written to urge the Commission to grant the Petition for Reconsideration of the City of New York relating to the decision addressing a mandated transition to 6.25 kHz spectrum efficiency technology. Failing to reconsider this decision will harm public safety communications enormously.

In its decision, the Commission stated that, once it determines that sufficient equipment is available, it intends to expeditiously mandate a date by which its licensees would be required to convert to 6.25 kHz technology. This intention was conveyed even as licensees are seeking to come into compliance with the prior mandate to transmit using 12.5 kHz technologies. Instead of moving to 12.5 kHz technologies, the Commission now urges agencies to move to 6.25 kHz directly. We urge the Commission to step back from its direction to mandate 6.25 kHz technology across the 150-174 MHz and 421-512 MHz bands. Instead, the Commission should invite comments from land mobile licensees regarding the best approach to structure a reasoned migration path to 6.25 kHz technology.

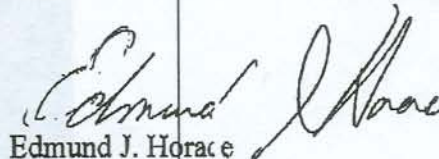
In addition, 6.25 kHz equipment is not available to the public safety sector. NCPD is currently in the midst of a large Public Safety Radio System Capital Project consisting of twenty four radio sites and over four thousand subscriber radio units, all utilizing 12.5 kHz technologies. There are many other projects across the nation that are being deployed at 12.5 kHz technologies. Massive amounts of local, state and federal funding are being directed toward the

national priority of improving communications quality and expanding interoperability. Yet, by following the Commission's directive, this work will have to be abandoned, which will thereby undermine efforts to modernize equipment and broaden interoperability.

If agencies are required to abandon this investment and turn to 6.25 kHz technologies, operations will suffer. To push forward ignores the technical challenges associated with narrower bandwidth and the need for a study to determine how best to meet these challenges. Without a detailed analysis examining the 6.25 kHz environment, public safety requirements will not be met.

The Commission should recede from its intended mandate to 6.25 kHz efficiency. Instead, it should examine how best to assist public safety agencies in improving communications and expanding interoperability.

Respectfully,

A handwritten signature in dark ink, appearing to read "Edmund J. Horace", is written over the typed name.

Edmund J. Horace
Deputy Inspector
Special Project Manager
Nassau County Police Department